

DAVID CLIFF
A Professional
Member of New York, New York

The Law Application granted. Opposition due 7/24/2020; reply due 8/6/2020.

SO ORDERED.

Ju

Philip M. Halpern
United States District Judge

Dated: New York, New York
July 2, 2020

BY ECF and By EMAIL: HalpernNYSDChambers@usdcny.gov
The Hon. Philip M. Halpern
500 Pearl Street
New York, NY 10007

*Re: Basile v. Wiggs, Westchester County Office of Child Support Enforcement, et al
United States District Court – S.D.N.Y. – Docket #19-CV-07266
Request for 14-Day Extension of Time To File Opposition To County's Motion*

Dear Judge Halpern:

I am counsel for the Plaintiff in the above captioned matter and I am writing to respectfully request a 14-day extension of time to file Mr. Basile's opposition to the County's pre-answer motion to dismiss. I have communicated both with counsel for Ms. Wiggs and the County and they have no objection to the request. Presently, in accordance with the Court's prior adjustment of the motion dates (Docket #34), Plaintiff's opposition papers to the motion are due next Friday, July 10, 2020.

Since the Court adjusted the motion schedule, many issues and challenges have arisen for me due to the Covid epidemic, not the least of which most of my client files and computers were damaged and destroyed in a flood where I had, until recently, been sheltering in place outside of New York City. Since that occurrence I have been feverishly attempting to reconstruct a number of cases and client files to keep matters moving.

Next week I am also scheduled to be engaged in taking depositions in a federal employment matter entitled Dr. Doretha Brown Simpson v. Martin de Porres School, that has been ongoing in the EDNY (Index No. 18-CV-07194). Due to the loss of many files and papers in the flood, including those related to Dr. Brown Simpson's case, I am scrambling to reconstruct and prepare for those imminent depositions. In light of that, it is extremely difficult for me to give the Plaintiff's opposition papers in this action the full time and attention that the County's formidable pre-answer motion requires.

As such, it is respectfully requested that the Court permit me a 14-day extension to file Mr. Basile's opposition on Friday, July 24, 2020.

As stated above, counsel for the Defendants have no objection to the request. Likewise, Plaintiff has no objection to any extension they may require to interpose any effort to join in the motion or to file a Reply in furtherance of the County's Pre-Answer Motion.

Most respectfully,

/S/

David C. Holland, Esq.

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